

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

CHRISTIE ANDREWS,

Plaintiff,

v.

**TRI STAR SPORTS AND
ENTERTAINMENT GROUP, INC.**

Defendant.

Civil No. 3:21-cv-00526
Judge Eli J. Richardson
Magistrate Judge Jefferey S. Frensley

**PLAINTIFF’S CORRECTED UNOPPOSED MOTION TO EXTEND THE DEADLINE TO FILE
RESPONSE TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Plaintiff files this motion to extend the deadline to file response to Defendant’s Motion for Summary Judgment (“MSJ Motion”) by seven days. The current trial date is April 11, 2023. Defendant filed its MSJ Motion on November 3, 2022, making the deadline to file a response November 25, 2022, the deadline¹.

Prior to filing this motion Plaintiff’s counsel conferred with Defense counsel and Defendant does not oppose this motion. As good cause for this motion Plaintiff provides that additional time is necessary due to the approaching holiday and the need to discuss what documents if any, a party contends should be filed under seal due to designation as confidential under the protective order entered in this case. Plaintiff will not oppose an equal extension for Defendant to file a reply.

The requested extensions will not delay the case or impact other deadlines in place. The requested extension will still conform to the requirements of Local Rule 16.01(h)(1) that no dispositive motion deadline, including response and reply briefs, shall be later than 90 days in

¹ November 24, 2022 is federal holiday under Federal Rule of Civil Procedure 6(a).

advance of the trial date.² Plaintiff request the deadline that following deadline for filing a response be extended to December 2, 2022. The reply deadline would be December 9, 2022.

For the foregoing reasons, Plaintiff respectfully requests this Court GRANT this motion.

Respectfully submitted,



Daniel Arciniegas

ARCINIEGAS LAW

² 90 days prior to the trial date of April 11, 2023, is January 11, 2023.

CERTIFICATE OF SERVICE

I hereby certify that on Monday November 21, 2022, I electronically served the foregoing ***Corrected Unopposed Motion to Extend the Deadline To File Response to Defendant's Motion for Summary Judgment*** via CM/ECF:

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Respectfully submitted,



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